

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GAIL DINES,
Plaintiff,

v.

C.A. No. 1:16-cv-11876-GAO

WHEELOCK COLLEGE,
a corporation, JACKIE JENKINS-SCOTT, in
her official and individual capacities,
KATHERINE S. TAYLOR, in her official and
individual capacities; and KINGSTON BAY
GROUP, a limited liability corporation,
Defendants.

AFFIDAVIT OF DAVID CHARD, PH.D.

I, David Chard, Ph.D., declare the following:

1. I am the President of Wheelock College ("Wheelock" or the "College").
2. I have personal knowledge of the facts set forth herein unless expressly stated otherwise.
3. This affidavit is filed in support of the Wheelock Defendants' Surreply in Opposition to Plaintiff's Motion for Admission of Visiting Lawyer Pro Hac Vice.
4. On August 19, 2016, I met with Joan Gallos, Ph.D. ("Dr Gallos") for approximately two-and-a-half hours concerning the litigation she is pursuing against the College.
5. During my meeting with Dr. Gallos, she handed me a copy of a document titled "Jury Verdicts" (the "Jury Verdicts Document"), a copy of which is attached hereto as Exhibit A. She also provided me with a copy of a document titled "Agenda," (the "Agenda"), a copy of which is attached hereto as Exhibit B. I did not request the documents; rather, Dr. Gallos provided them to me on her own initiative. Dr. Gallos also offered to provide me with electronic copies of the documents, and I accepted her offer.

6. After the meeting, at 5:29 p.m., Dr. Gallos forwarded electronic copies of the Jury Verdicts Document and the Agenda to me by email. A copy of her email, including the attachments, is attached hereto as Exhibit C.

7. That same day, at 11:17 p.m., Dr. Gallos again emailed me. A copy of her email is attached hereto as Exhibit D.

8. I declare under the penalties of perjury on this 13th day of January 2017 that the foregoing is correct and true.

A handwritten signature in cursive script, appearing to read "David Gallos", is written over a horizontal line.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on January 13, 2017.

/s/ Scott A. Roberts